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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

The Hon. James Donato

CIVIL ACTION

**DECLARATION OF YAVAR
BATHAE REGARDING
COMPLIANCE WITH DKT. NO. 301**

1 Pursuant to 28 U.S.C. §1746, I, Yavar Bathaee, declare:

2 1. I am a partner at Bathaee Dunne LLP and am licensed in the State of California and
3 admitted to the United States District Court for the Northern District of California. I have personal
4 knowledge of the facts set forth in this declaration and, if called as a witness, could and would
5 testify competently to them.

6 2. On March 18, 2022, the Court appointed Kristen M. Anderson of Scott+Scott
7 Attorneys at Law LLP and me as Interim Class Counsel for the Advertiser Class in the above-
8 captioned matter. *See* Dkt. No. 43.

9 3. On April 21, 2022, Advertiser Plaintiffs moved to compel Defendant Meta
10 Platforms Inc. (“Meta”) to produce all presentations and related documents Meta provided to the
11 Federal Trade Commission (“FTC”). *See* Dkt. No. 281.

12 4. On May 13, 2022, Meta opposed Meta’s motion to compel. *See* Dkt. No. 296.

13 5. On May 23, 2022, the Court ordered lead counsel for the parties to meet and confer
14 on a resolution of the issues briefed in Dkt Nos. 281 and 296, as well as Dkt. Nos. 294, 296, 297,
15 and 298 relating to motions to compel filed by Consumer Plaintiffs. *See* Dkt. No. 301. Further, the
16 Court ordered that the meet-and-confer be held in person unless lead counsel were more than 100
17 miles apart, in which case a video access platform could be used, and that the conference should
18 be held for a minimum of four hours and could be terminated earlier only if all disagreements had
19 been resolved. *Id.* This declaration is made pursuant to the Court’s Order at Dkt. No. 301 requiring
20 lead counsel for each of the parties to certify compliance with that Order.

21 6. On May 27, 2022, lead counsel for the parties met and conferred regarding these
22 discovery disputes from 11 a.m. until 4 p.m. EST. Ms. Anderson and I met with David Gringer,
23 counsel for Meta, in person at the New York, New York office of Wilmer Cutler Pickering Hale and
24 Dorr, LLP. Other lead counsel, including Stephen A. Swedlow of Quinn Emanuel Urquhart &
25 Sullivan LLP, Shana A. Scarlett of Hagens Berman Sobol Shapiro LLP, and Sonal Mehta of Wilmer
26 Cutler Pickering Hale and Dorr, LLP, all located more than 100 miles outside of New York, New
27 York, participated in the meet-and-confer via video access platform.

1 7. During the meet-and-confer, Meta and Advertiser Plaintiffs reached a resolution
2 regarding Meta's production of FTC presentations, which the parties subsequently confirmed in
3 email correspondence on June 6, 2022, resolving the issues briefed in Dkt Nos. 281 and 296.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Dated: June 17, 2022

s/ Yavar Bathaee
YAVAR BATHAEE

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List. All parties not so registered will be served via e-mail or U.S. Mail.

Executed on June 17, 2022, at New York, New York.

s/ Yavar Bathaee
YAVAR BATHAEE (CA 282388)